

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	Criminal No. 05-30008-MAP
)	Criminal No. 05-30009-MAP
)	
v.)	
)	
RONALD CHARLES,)	
Defendant.)	

GOVERNMENT'S MOTION FOR ENTRY
OF AN ORDER OF EXCLUDABLE DELAY

Now comes the United States, by its undersigned attorneys, and hereby moves that the Court enter an Order of Excludable Delay from November 2, 2005 through January 30, 2006 pursuant to 18 U.S.C. §§ 3161(h)(1)(F), 3161(h)(1)(J) and 3161(h)(8)(A). The government relies on the following in support thereof.

The Court held a Status Conference on July 1, 2005. During that conference counsel for the defendant requested until September 8, 2005 to file a Motion to Suppress. Subsequently, on September 22, 2005, the defendant requested until October 7, 2005 to file his Motion to Suppress. The Court held a Status Conference on September 30, 2005 during which it allowed the defendant's Motion, gave the government until October 21, 2005 to file a response and established a date of November 2, 2005 for oral argument on the Motion. On November 2, 2005 the Court held a hearing and determined that it would be necessary to hold an evidentiary hearing and scheduled that hearing for November 17, 2005. On November 17, 2005 the Court heard evidence on the

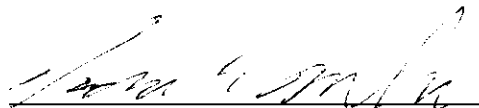
Motion to Suppress and took the issue under advisement. The Court had previously scheduled a trial for January 30, 2006 because the defendant requested time to prepare for trial.

The exclusion of this time from the Speedy Trial time period is in the interests of justice. The defendant assents to this motion. Therefore, the government moves that the Court exclude the time between November 2, 2005 until the date the Court issues its Order on the Motion to Suppress from the speedy trial time period pursuant to 18 U.S.C. §§ 3161(h)(1)(F) and 3161(h)(1)(J). Further the government moves that the Court exclude the time between the date the Court issues its Order on the Motion to Suppress through January 30, 2006 from the speedy trial time period pursuant to 18 U.S.C. § 3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

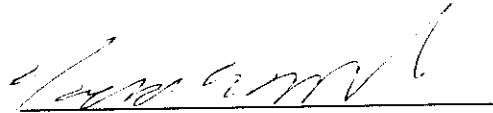

TODD E. NEWHOUSE
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
November 18, 2005

I, Todd E. Newhouse, Assistant U.S. Attorney, do hereby certify that I have served, by first class mail, a copy of the foregoing, to all counsel of record.

A handwritten signature in black ink, appearing to read "Todd E. Newhouse", written over a horizontal line.

TODD E. NEWHOUSE
Assistant U.S. Attorney